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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Petitioner Nexon Korea Corporation (“Nexon”), a South Korean video game developer and publisher by and through its undersigned counsel, hereby requests that the Clerk of this Court issue a subpoena to Discord, Inc., pursuant to 17 U.S.C. § 512(h).

Section 512(h) of the Digital Millennium Copyright Act (“DMCA”) provides that a “copyright owner or a person authorized to act on the copyright owner’s behalf may request the clerk of any United States district court to issue a subpoena to a service provider for identification of an alleged infringer in accordance with this subsection.” 17 U.S.C. § 512(h)(1).

For a subpoena to be issued, Section 512(h) requires that a copyright owner file the following with the Clerk:

1. A copy of the DMCA takedown notification required by Section 512(c)(3)(A);

1 2. A proposed subpoena; and
2 3. A sworn declaration to the effect that the purpose for which the subpoena is sought is to
3 obtain the identity of an alleged infringer and that such information will only be used for the
4 purpose of protecting rights under this title.

5 Accordingly, Petitioner submits concurrently herewith its previously issued DMCA takedown
6 notification, a proposed subpoena, and a sworn declaration of counsel. As Nexion has complied with
7 the requirements of the statute, it asks that the Clerk expeditiously issue a subpoena ordering Discord,
8 Inc. to disclose Nexion information sufficient to identify the infringers, including user IDs,
9 username(s), name(s), last known telephone number(s), any and all email address(es), IP addresses
10 (including, but not limited to, registration IP address and last seen IP address) and billing information.

12 DATED: November 5, 2024

Respectfully Submitted,

14 BRUSS LEGAL PLLC

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